

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

SHARON DORSEY,

Plaintiff,

v.

Case No.: \_\_\_\_\_

TRANS UNION, LLC and I C SYSTEM,  
INC.,

Defendants.

**DEFENDANT TRANS UNION LLC'S NOTICE OF REMOVAL**

COMES NOW Defendant Trans Union LLC ("Trans Union") and files this Notice of Removal pursuant to 28 U.S.C. § 1446(a), and in support thereof would respectfully show the court as follows:

**A. PROCEDURAL BACKGROUND**

1. On October 18, 2022, Plaintiff Sharon Dorsey ("Plaintiff") filed her Complaint in the Circuit Court of Blount County, Alabama, under Case No. 08-cv-2022-900123.00 ("State Court Action") alleging that Defendant Trans Union ("Trans Union") violated the Fair Credit Reporting Act ("FCRA"), 15 U.S.C. § 1681 *et seq.* and the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692 *et seq.*

2. Defendant Trans Union was served with Plaintiff's Complaint on October 24, 2022. This Notice of Removal is being filed within the thirty (30) day time period required by 28 U.S.C. §1446(b).

**B. GROUNDS FOR REMOVAL**

3. The present suit is an action over which this Court has original jurisdiction pursuant to 28 U.S.C. § 1331, as it is a civil action founded on a claim or right arising under the laws of the United States, and may be removed to this Court by Trans Union pursuant to the provisions of 28 U.S.C. § 1446(b). Removal is proper because Plaintiff's claims present a

federal question. *See* 28 U.S.C. §§ 1331 and 1441(a). In the Complaint, Plaintiff seeks damages for Trans Union's alleged violations of the FCRA and FDCPA. Moreover, although Plaintiff's Complaint appears to exclusively assert federal claims under the FCRA and FDCPA, any imprecise claims in Plaintiff's Complaint based on state and common law may be adjudicated by this Court pursuant to 28 U.S.C. §§ 1367 and 1441(c).

**C. COMPLIANCE WITH PROCEDURAL REQUIREMENTS**

4. Pursuant to 28 U.S.C. § 1441(a), venue of the removal action is proper in this Court because it is in the district and division embracing the place where the state court action is pending.

5. On the same day that this Notice of Removal is filed, Trans Union will give written notice of the removal to Plaintiff, and will file a copy of this Notice of Removal with the Clerk of the Circuit Court of Blount County, Alabama, as required by 28 U.S.C. § 1446(d).

6. Pursuant to 28 U.S.C. § 1446(a), a copy of all executed process, pleadings asserting causes of action, and orders in the State Court Action served upon Defendant Trans Union are attached hereto as **Exhibit A**.

7. Trial has not commenced in the Circuit Court of Blount County, Alabama.

8. Defendant I C System, Inc., who has been served upon the date of filing of this Notice of Removal and remains a party to this litigation, consents to the removal of this case. Joinder in the Removal from Defendant I C Systems, Inc. is attached hereto as **Exhibit B**.

9. By filing this Notice of Removal, Trans Union LLC consents to the removal of this case.

WHEREFORE, PREMISES CONSIDERED, Trans Union LLC, hereby gives notice that this action is removed to this, the United States District Court for the Northern District of

Alabama, Southern Division, and requests that it receive such other and further relief to which it may show itself justly entitled at law or in equity.

Respectfully submitted,

*s/Matthew W. Robinett*

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**MATTHEW W. ROBINETT**

ASB-3523-I72M

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ASB-7908-W15J

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 23rd day of November 2022, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

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*Counsel for Plaintiff*

*s/Matthew W. Robinett*

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**MATTHEW W. ROBINETT**